IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: : Chapter 13

Donna O. Rismay :

No: 19-13369- MDC

Lakeview Loan Servicing, LLC :

Movant

VS.

Donna O. Rismay, Debtor : Gerald Rismay, Co-Debtor

Kenneth E. West, Esquire, :

Trustee

:

Debtor Donna Rismay's Response to the Motion of Lakeview Loan Servicing, LLC's Motion for the Relief from the Automatic Stay Under Section 362 of the U.S. Bankruptcy Code

And Now comes the Debtor, Donna Rismay, and by and through her undersigned Vaughn A. Booker, Esquire and in support of his Response to the Motion for Relief from the Automatic Stay filed by the Creditor Lakeview Loan Serving, LLC, and prays your Honorable Court as follows:

- 1. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.
- 2. Admitted.
- 3. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.
- 4. Admitted.
- 5. Admitted.

- 6. Denied. It is specifically denied that the Debtor has failed to make Post-Petition payments in the amounts of \$1692.21.47 for each of the months of March 2022 through May 2022, as alleged. To the contrary, the Debtor has made payments from March 2022 through May 2022. Strict proof to the contrary is demanded at Trial.
- 7. Denied. It is specifically denied that the Debtor owes \$5,076.63 on the post petition loan payments as alleged. To the contrary, the Debtor is current. Strict proof to the contrary is demanded at Trial.
- 8. Denied. Strict proof to the contrary is demanded at Trial.
- 9. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.
- 1 Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.

Wherefore, for all of the foregoing reasons, the Debtor Donna Rismay prays your Honorable court to deny and dismiss the Creditor Lakeview Loan Servicing, LLC's Motion for Relief from the Automatic Stay.

Respectfully Submitted:

/s/ Vaughn A. Booker, Esquire
Vaughn A. Booker, Esquire
Attorney for Debtor,
Donna Rismay

Dated May 13, 2022

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:		: Chapter 13
Donna O. Rismay		:
٠	Debtor	No: 19-13369- MDC
Lakeview Loan Servicing	:	
_	Movant	
vs.		:
Donna O. Rismay,	Debtor	:
Gerald Rismay,	Co-Debtor	
Kenneth E. West, Esquire		:
, I	Trustee	
		:

ORDER

And Now to wit, this day of , 2021 and based upon the within Response of the Debtor Donna Rismay to the Motion for Relief from the Automatic Stay under Section 362 (a) of the Creditor Lakeview Loan Servicing, LLC, it is Hereby Ordered and Decreed that the Motion is Denied.

By the	e Cour	t :	
			J